

REMARKS

Claims 1-13 are pending. Claims 1 and 13 have been amended. The Abstract and specification were also amended.

No new subject matter has been added to the application.

Claims 1-13 were rejected under 35 U.S.C. §102(b) in view of Vlietinck. This rejection is respectfully traversed by the above amendments to the claims.

In order to sustain a §102 rejection of the claims, each and every feature of the claims must be taught by the reference. Independent claims 1 and 13 were amended to include the feature that *tile data is merged independently from neighboring, previously merged or underlying tile data.*

Support for the amendments to the claims is found throughout the specification, for example (underscore added) at:

- page 5 lines 34-38 : " This area tile 12' contains all the information necessary for the reproduction of the region 12 of the image portion 11. The term "autonomic" area tile 12' is used because no data from other area tiles 12' is needed to reproduce the region 12 of the image portion 11 described."
- page 14 lines 1-3 : " These area tiles 12' are in a format allowing easy reproduction of the area tile 12' without the use of data of other area tiles 12'. This also relates to the term "autonomic" area tile 12'."
- page 18 lines 16-23 : " When preparing the printing job, a page element 11' is segmented into different autonomic area tiles 12'. Each area tile 12' has tile data representative for a

region 12 of the image portion 11. This data is stored into the memory means 23. There is no limit on the maximum number of area tiles 12' within a page element 11'. A page element 11' is preferably completely self-contained and therefore can be drawn separately i.e. without using data from a neighboring page element 11' or it can be extracted out of a file."

- page 27 lines 25-34 : " When writing into memory locations of the buffer, already occupied by page elements 11' laying closer to the bottom layer, the data already in the buffer are simply overwritten. This causes not problems as the overlaying page element is always written after the bottom layers. Because the drawing limit (e.g. LB) of the underlying page elements is always higher than the drawing limit of the overlying page elements (e.g. LB) it is not possible that data of the underlying page elements is written at memory locations where data of overlying page elements is already written."
- page 28 lines 9-15 : " The positioning of underlying image blocks 14' has no influence on the placement of the image blocks 14' of an upper level."

All the above passages indicate that the tile data of the area tile is independently merged to the page without need of information or influence of other tile data. The merging of the tile data not only relates to the merging of the area tiles but also to merging of sub-elements of it such as image tile or image blocks.

In contrast to the current claims, Vlietinck *does not describe or disclose a method or apparatus where tile data is merged independent from neighboring, previously merged or overlapping tile data*. Rather, Vlietinck clearly discloses overlapping tile data. For example,

Figure 2(b) of Vlietinck illustrates overlapping tiles. Also, the following passages of Vlietinck describe interdependence between merged elements, especially continuous tone data, to enhance processing speed:

- page 8 lines 29-32 indicating that CT page elements are repositioned before merging.
- page 17 lines 20-24 indicating an adjustment of a CT validity mask
- page 38 line 16-34 blocks are aligned to each other before merging
- page 39 line 1-5 indicates possible generation of artefacts by translation of blocks
- page 39 line 16-33 CT is scaled and repositioned by the RIP.

In contrast to the current claims, Vlietinck describes tile data (CT image blocks) that are altered and repositioned by the merging system so that the merging of these page elements is not independent from the data of other page elements.

Also, the present invention has the advantage that placement of the page element can be at any arbitrary position and exactly according to the page layout data. This is clearly not the case in Vlietinck et al.

In view of the foregoing remarks and amendments, it is respectfully submitted that each rejection of the Office Action has been addressed and overcome so that this application is now in condition for allowance. The Examiner is respectfully requested to reconsider the application, withdraw the rejections and/or objections, and pass the application to issue. Should questions arise during examination, the Examiner is welcome to contact the applicant's attorney as listed below.

It should be noted that the above arguments are directed towards certain patentable distinctions between the claims and the prior art cited. However, the patentable distinctions between the pending claims and the prior art cited are not necessarily limited to those discussed above.

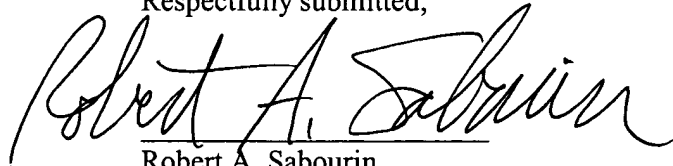
The prior art made of record and not relied upon has been reviewed but is not considered material to the patentability of the invention.

An Information Disclosure Statement, reference, Assignment and PTO Form 1595 are attached with this response.

A Petition for a One-Month Extension of Time in which to respond to the outstanding Office action, to and through at least January 13, 2005, accompanies this response. Should the Petition become lost or otherwise separated from this response, the Examiner is requested to treat this response as the original Petition.

Please charge the \$110.00 one-month extension fee, the \$240.00 IDS fee, the \$40.00 assignment fee and any other fees due under this general authorization to Deposit Account No. 501490.

Respectfully submitted,



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